IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF PENSYLVANIA

SCI SPARK LLC,

Plaintiff,

v.

Abucaky et al,

Defendants.

Case No. 2:25-cv-00506-WSH

Hon. Judge W. Scott Hardy

DEFENDANT'S MOTION FOR EXTENSION OF TIME

Defendant "Huasonchou Shop", "Huayijie-us"; "Oujietong-us", by and through their undersigned counsel, respectfully request an extension of time to respond to Plaintiff's Complaint.

In support, Defendants state as follows:

- 1. Based on the ostensible service date of the Summons (dated April 18, 2025), the original due date for Defendants to answer or otherwise respond to the Complaint was **May 19, 2025.**
- 2. Defendants have been engaged with Plaintiff in good faith settlement negotiations since April 2025. Parties exchanged positions over the course of the negotiations several rounds but have not reached a resolution. As such, Defendants would require additional time to continue with settlement discussions and/or file a response to the Complaint.
- 3. This Court may, for good cause, extend the time by which a Defendants' response is due. Good cause exists in this case. Fed. R. Civ. P. 6(b)(1)(B). Defendants believe that Plaintiff will not be prejudiced by a short extension, and the impact on judicial proceedings is minimal if any.

- 4. Defendants respectfully request this Court extend the date for the Defendants to file answer and/or other response(s) to Plaintiff's Complaint, if ultimately necessary, to **June 23, 2025**.
 - 5. No previous request for extension of time for the Defendants was made.
 - 6. Plaintiff consented to this proposed extension request.

WHEREFORE, Defendants respectfully pray that this Court enter an order extending Defendants' due date to answer and otherwise respond to Plaintiff's Complaint to **June 23, 2025**.

Dated: June 3, 2025

By: /s/ Yong Chen Yong Chen Attorney for Defendant 14 Penn Plaza, Ste 2020 New York, NY 10122 212.547.6694

Email: ychen@ambizlaw.com

CERTIFICATE OF SERVICE

The undersigned certifies that a copy of the foregoing **Motion for Extension of Time** was served upon on all counsel of record electronically through CM/ECF on June 3, 2025.

/s/ Yong Chen